

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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1199 SEIU UNITED HEALTHCARE WORKERS
EAST,

Plaintiff,

v.

EASTCHESTER REHABILITATION
AND HEALTH CARE CENTER,

Defendant.
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ANSWER

Case No. CV-07-8654(NRB)

EASTCHESTER REHABILITATION AND HEALTH CARE CENTER
(hereinafter referred to as "Defendant"), by its attorneys, Naness, Chalet & Naness, LLC,
answers the complaint of 1199 SEIU UNITED HEALTHCARE WORKERS
EAST (hereinafter referred to as "Plaintiff") and alleges as follows:

1. Defendant admits the allegations set forth in paragraph 1 of the Complaint.
2. Defendant admits the allegations set forth in paragraph 2 of the Complaint.
3. Defendant admits the allegations set forth in paragraph 3 of the Complaint.
4. Defendant admits the allegations set forth in paragraph 4 of the Complaint.
5. Defendant admits the allegations set forth in paragraph 5 of the Complaint.
6. Defendant admits the allegations set forth in paragraph 6 of the Complaint.
7. Defendant admits the allegations set forth in paragraph 7 of the Complaint.
8. Defendant admits the allegations set forth in paragraph 8 of the Complaint.
9. Defendant admits the allegations set forth in paragraph 9 of the Complaint.
10. Defendant admits the allegations set forth in paragraph 10 of the Complaint.
11. Defendant admits the allegations set forth in paragraph 11 of the Complaint.

12. Defendant admits the allegations set forth in paragraph 12 of the Complaint.
13. Defendant admits the allegations set forth in paragraph 13 of the Complaint.
14. Defendant repeats and re-alleges the allegations set forth in paragraphs 1 through 13 as set forth more fully above.
15. Defendant admits the allegations set forth in paragraph 15 of the Complaint.
16. Defendant admits the allegations set forth in paragraph 16 of the Complaint.
17. Defendant admits the allegations set forth in paragraph 17 of the Complaint.
18. Defendant denies the allegations set forth in paragraph 18 of the Complaint.
19. Defendant denies the allegations set forth in paragraph 19 of the Complaint.

Wherefore Defendant requests that Court issue an Order dismissing the complaint and for such other relief as the Court may deem proper.

Dated at Jericho, New York
November 5, 2007

A handwritten signature in blue ink, appearing to read "Clifford P. Chalet", is written over a horizontal line.

Clifford P. Chalet (CC 0609)
Naness, Chalet & Naness, L.L.C.
Attorneys for Defendant
375 North Broadway, Suite 202
Jericho, New York 11753
(516) 827-4300